

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF WISCONSIN

CLERK'S OFFICE

A TRUE COPY

Jan 19, 2021

s/ Daryl Olszewski

Deputy Clerk, U.S. District Court  
Eastern District of Wisconsin

In the Matter of the Seizure of  
(Address or brief description of property or premises to be seized)

ONE WHITE MERCEDES S550 SEDAN BEARING  
VEHICLE IDENTIFICATION NUMBER (VIN)  
WDDNG9EB0DA528708

Case Number: 21 MJ 38

APPLICATION FOR A WARRANT  
TO SEIZE PROPERTY SUBJECT TO FORFEITURE

I, Matthew Rech III, being duly sworn depose and say:

I am a Special Agent with the Internal Revenue Service, Criminal Investigation and have reason to believe that in the Eastern District of Wisconsin there is now certain property, namely one white Mercedes S550 sedan bearing vehicle identification number (VIN) WDDNG9EB0DA528708, that is civilly forfeitable under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references in § 981(a)(1)(C) to 18 U.S.C. §§ 1956(c)(7) and 1961(1), and criminally forfeitable under 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and 28 U.S.C. § 2461, as property that (1) constitutes or is derived from proceeds traceable to specified unlawful activity, namely, wire fraud in violation of 18 U.S.C. § 1343; and (2) was "involved in" a money laundering transaction in violation of 18 U.S.C. §§ 1956(a)(1)(B)(i) and 1957, and which property is therefore also subject to seizure for purposes of civil forfeiture under 18 U.S.C. § 981(b) and for purposes of criminal forfeiture under 18 U.S.C. § 982(b)(1) and 21 U.S.C. § 853(f).

The application is based on these facts:

☒ Continued on the attached sheet.

☐ Delayed notice of \_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone and email.


January 19, 2021 at 4:41 PM  
Date and time issued

William E. Duffin, U.S. Magistrate Judge  
Name & Title of Judicial Officer



Signature of Affiant  
Matthew Rech III, Special Agent

at Milwaukee, Wisconsin  
City and State



Signature of Judicial Officer

**AFFIDAVIT IN SUPPORT OF  
AN APPLICATION FOR A SEIZURE WARRANT**

I, Matthew Rech III, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with Internal Revenue Service, Criminal Investigation (“IRS-CI”) and have been so employed since February 2006. My responsibilities as a Special Agent include the investigation of potential criminal violations of the Internal Revenue Code under Title 26 of the United States Code as well as related Title 18 and Title 31 offenses. In my career, I have conducted multiple investigations involving money laundering and have obtained seizure warrants for criminal proceeds and property involved in money laundering and Title 31 offenses. In the course of those investigations, I have used various investigative techniques, including reviewing physical and electronic evidence, and obtaining and reviewing financial records. In the course of those investigations, I have also become familiar with techniques that criminals use to conceal the nature, source, location, and ownership of proceeds of crime and to avoid detection by law enforcement of their underlying acts and money laundering activities.

2. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**PURPOSE OF AFFIDAVIT**

3. I submit this affidavit in support of an application for a seizure warrant for a **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708.**

4. Based on the facts set forth herein, I submit there exists probable cause to believe Rolando Greer and Corey Lee have been involved in business email compromise (“BEC”)

schemes. A BEC scheme is a form of cybercrime that uses a fraudulent email to obtain funds from an organization or business entity. The scheme typically targets employees in financial roles and with access to entity funds within the victim organization. The fraudulent email will provide false instructions regarding financial transactions in order to defraud the employee into sending money or sensitive personal identifying data to the fraudster's bank account.

5. Based on the facts set forth herein, I further submit that there exists probable cause to believe that Rolando Greer purchased the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** with proceeds of the above described scheme in violation of 18 U.S.C. § 1343, that said vehicle was involved in a money laundering transaction in violation of 18 U.S.C. § 1957 and 18 U.S.C. § 1956 (a)(1)(B)(i), and further that the vehicle is subject to civil forfeiture under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references in § 981(a)(1)(C) to 18 U.S.C. §§ 1956(c)(7) and 1961(1), and criminal forfeiture under 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and 28 U.S.C. § 2461(c).

6. I am submitting this affidavit for the limited purpose of establishing probable cause for the issuance of a seizure warrant., I have not included each and every act I know about this investigation. Rather, I have set forth only the facts that I believe are necessary to establish probable cause to support the issuance of a seizure warrant for the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708**.

#### **FACTS SUPPORTING PROBABLE CAUSE**

7. Company 1, located in Texas, is a distributor of electrical and power generator parts. J.G. and K.R. are owners/partners of Company 1.

8. Company 2 is an electrical and lighting contractor also headquartered in Texas. Company 2 purchases products from Company 1.

9. On June 24, 2019, a manager of Company 2 received an email purportedly from J.G. of Company 1, stating that Company 1 had recently made upgrades to their billing system, and that as of June 24, 2019, their bank account details changed for Automatic Clearing House/Electronic Funds Transfer (“ACH/EFT”) payments. The email requested that Company 2 make the necessary changes to their billing system in order to avoid any delay in receiving payments from Company 1. The email included a letter with Company 1’s letterhead and had ACH/EFT instructions listing Bank of America (“BOA”) account ending in # 6337, routing # 081904808, account name (Company 1), and remittance email of J.G.’s email address. Company 2’s manager forwarded the new payment information to Company 2’s corporate vender relations team, which processes ACH payments for Company 2’s invoices.

10. On June 27, 2019, a separate email exchange occurred between a representative of Company 2 and someone utilizing K.R.’s email address (of Company 1) about when payment would be made on a recent invoice. The Company 2 representative wrote that the recent Company 1 invoice was entered into the system and a check had been cut as payment. Someone utilizing K.R.’s email address replied and requested that the Company 2’s check be cancelled, and that Company 2 make payment according to the ACH/EFT instructions attached thereto, listing the BOA account ending in # 6337, account name (Company 1), and the remittance email of J.G.’s email address. Thereafter, the Company 2 representative forwarded the information to Company 2’s home office, which coordinates payments. The home office was able to cancel the check and began to process the payments according to the new instructions purportedly from Company 1.

11. On or about June 28, 2019, Company 2 initiated an ACH/EFT transfer of \$527,398 from Company 2’s bank account at BBVA Compass Bank to the BOA account ending in # 6337 specified in the new instructions purportedly from Company 1.

12. A few days after processing the ACH transfer to BOA, an official from BOA contacted Company 2 about the \$527,398 transfer. A Company 2 representative confirmed to BOA that the customer BOA identified as the receiver of the funds was not the intended receiver of the ACH transfer.

13. The Company 2 representative then reached out to BBVA bank where the \$527,398 ACH transfer originated. BBVA confirmed the receipt of the ACH by BOA and then attempted to recall the funds from BOA. The BOA account ending in #6337 was closed on August 12, 2019, and the remainder of \$124,900.35 was sent back to Company 2's BBVA bank account.

14. As part of the investigation, the owners/partners of Company 1 were contacted, and they confirmed the following:

- a. On July 9, 2019, Company 1 contacted Microsoft 365 Data Protection Support Engineer Department, which confirmed that the two email accounts of J.G. and K.R. had been compromised by use of a filter setup. According to Microsoft, these email addresses were "hacked" to delete various legitimate emails from the Company 1 owners/partners, and then the hackers would send out and receive emails using the actual Company 1 partners' email addresses. In essence, the "hackers" were able to mask their identities and assume the email identity of the partners of Company 1.
- b. J.G. and K.R. stated that no one had permission to use the Company 1 name and logo to misrepresent their company and change the payment method on outstanding invoices to the BOA account ending in #6337.
- c. According to Microsoft, email communications of the Company 1 owners/partners and various vendors were compromised between the

approximate dates of June 24, 2019, and July 8, 2019.

15. J.G. confirmed that he did not send the aforementioned email containing the “new” billing system instructions to Company 2.

16. Records from BOA for the account ending in #6337 show that the account was opened on September 17, 2018, in the name of Home Improvements by CL, LLC, with the owner Corey Lee. Corey Lee’s Wisconsin-issued driver’s license was used as identifying information to open the account. No email address was associated with this account.

17. Wisconsin Department of Financial Institutions has a listing for Home Improvements by CL, LLC as being organized in 2008, but in delinquent status since 01/01/2020. The registered agent is Corey G. Lee Sr. of 3324 N. Richards St., Milwaukee, WI 53212. It was restored to good standing on 04/18/2018, but has been delinquent since 01/01/2020.

18. The company does not have much of an online presence beyond a lengthy bad review from a remodel customer.

19. An opening deposit of \$100 was made into BOA account ending in #6337 on September 17, 2018, along with one additional \$100 deposit. Then on 03/07/2019, the proceeds of check #1007 in the amount of \$38,200 were deposited into account #6337. Investigators traced check #1007 as proceeds of another business email compromise scheme that occurred in March 2019.

20. As part of the investigation, investigators obtained the Internet Protocol “IP” address used to log into the BOA bank accounts remotely. The IP addresses used to log into the BOA “Home Improvements by CL LLC” account ending #6337 were 104.231.219.66 and 75.86.9.112. Internet service provider subscriber information records associated with these IP addresses shows that IP address 104.231.219.66 was assigned from May 1, 2019, until September



19, 2019, to Corey Lee, located at 4215 N. 51st Blvd., Milwaukee WI 53216, and email address homeimproveimprovementbycl2014@gmail.com.

21. Charter Communications records indicate that IP address 75.86.9.112 was assigned from March 5, 2018, to August 1, 2019, to Rolando Greer with a former address of 3404 N. 40th St., Milwaukee, WI 53216, and email address Rogreer32@gmail.com.

22. Subscriber information from Google for email account Rogreer32@gmail.com shows that the account was created on January 3, 2010, and lists the subscriber's name as Rolando Greer. The account lists a recovery email of Rogreer1971gl@yahoo.com.

23. On April 30, 20120 and October 7, 2020 Charter Communications, provided current subscriber information for Rolando Greer as #027068312 with an address of 5290 N. 73<sup>rd</sup> St. Milwaukee, WI 53218, telephone number 414-455-8116, and an email address of rogreer32@gmail.com.

24. Wisconsin Electric Power company d/b/a We Energies residential account application information was obtained on March 16, 2020, in the name of Rolando Greer for the address of 5290 N. 73<sup>rd</sup> St. (Upper), Milwaukee, WI 53218 (acc. # 3211091989) and was activated on 07/30/2019 after his previous service address of 3404 N. 40<sup>th</sup> St. (Upper), Milwaukee, WI was terminated. This account in the name of Rolando Greer was confirmed by We Energies to be current and active for the address of 5290 N. 73<sup>rd</sup> St. Milwaukee, WI 53218 as of the date of November 24, 2020.

25. According to information obtained from the Wisconsin Department of Workforce Development (DWD), Lee's last reported income was the first quarter of 2007 when he had \$6,588.00 in income. Greer's last quarter of reported income was the second quarter of 2007 when \$600.00 was reported for him. Therefore, as discussed below, based on their training and

experience, and the investigation to date, case agents believe that Greer's purchase of the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** was made using undeclared income.

**MONEY LAUNDERING TRANSACTION - PURCHASE OF 2013 MERCEDES USING PROCEEDS OF BEC SCHEME**

26. The BOA transactions of July 1, 2019, by Lee also include a cashier's check in the amount of \$19,476 to payee Rolando Greer. This check was deposited into Educator's Credit Union ("ECU") savings member/account ending in #7757. A total of \$19,300 was then transferred to checking member/account ending in #7757. A review of the checking and savings account records associated with account ending in #7757 show that the accounts were opened on November 6, 2013, with the sole member listed as Rolando R. Greer of 3918 N. 37th St., Milwaukee, WI 53216 who provided a driver's license as identification, and an associated email address of Rogrrer32@yahoo.com.

27. The BOA transactions on July 1, 2019, by Lee also include a wire transfer in the amount of \$78,648 into the ECU business checking member/account ending in #4383, and a cashier's check in the amount of \$57,000 to payee All City Limousine Services, which was deposited into ECU savings member/account ending in #4383.

28. A review of records associated with the checking and savings account ending in #4383 show that it was opened on April 27, 2017, in the name of All City Limousine Services, LLC, with the sole member listed Rolando R. Greer. The email associated with this account was rogreer32@gmail.com. Throughout July 2019, a total of \$55,275.88 was transferred from the business savings account ending in #4383 to the business checking account ending in #4383.



29. The Wisconsin Department of Financial Institutions has a listing for All City Limousine Services LLC. The registered agent is Rolando Greer of 9500 W. Debbie LN, Milwaukee, WI 53224. It has an effective date of organization on 04/20/2017, but has been delinquent since 04/01/2020. A limited online presence was found, and the posts and pictures are limited and dated.

30. Throughout July 2019, a total of approximately \$109,703.67 was transferred from the ECU checking account ending in #4383 into ECU checking member/account ending in #7757 belonging to Rolando R. Greer. An additional \$1,200 was transferred from ECU business savings account ending in #4383 into ECU checking member/account ending in #7757. Throughout the month of July 2019, a total of approximately \$82,128.31 in cash/ACH withdrawals was made from the ECU account ending in #7757, including a \$27,400 cash withdrawal for an ECU cashier's check dated July 3, 2019, in the full amount of \$27,400 to payee Lux Cars, with a remitter of Roland R. Greer.

31. The ECU cashier's check for \$27,400 was cashed and deposited by Lux Cars of Chicago, in connection with the July 3, 2019, purchase of a **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** for a total of \$27,488. A cash receipt of \$89 was also provided to Greer for the balance.

32. On October 8, 2020 an individual matching the description of Greer was observed leaving the residential duplex of 5288 & 5290 N. 73rd St., Milwaukee, WI 53218 operating the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** with a WI registration plate of AFT 9525.

33. I have seen the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** with a Wisconsin registration plate of AFT 9525 on many occasions

during the previous months parked in the driveway of 5288 / 5290 N. 73<sup>rd</sup> St. Milwaukee, WI 53218.

34. According to records from the Wisconsin Department of Transportation, Wisconsin plate (AFT 9525) is registered in the State of Wisconsin to Rolando Ray Greer, D.O.B 07-11-1971 with an address of 9500 W. Debbie Lane, Milwaukee, WI 53224.<sup>1</sup>

35. Wisconsin Department of Transportation records received include a Wisconsin Title Application (19200RC007-1) dated 07/19/2019 in the name of Rolando R GREER, D.O.B 07-11-1971.

36. Most recently, on the date of December 9, 2020 at approximately 6:45 A.M. the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** (WI AFT 9525) was parked in front of the driveway of the detached garage of 5290 N. 73rd St., Milwaukee WI 53218. I also observed an empty cardboard box that was placed next to the garbage can at the edge of the common sidewalk next to the driveway of 5290 N. 73rd St., Milwaukee, WI 53218. The shipping label was still affixed to the box and it was addressed to Rolando Greer of 5290 N. 73rd St. Milwaukee, WI.

37. Two personal checks from ECU account ending in #7757 were also cleared in July 2019. These checks were made out to Home Improvements by CL, LLC (Check #1177 in the amount of \$9,800 and Check #1178 in the amount of \$10,200). These two personal checks were deposited into ECU checking account ending in #1697. A review of records associated with the savings/checking account ending in #1697 showed that the account was opened on March 21,

---

<sup>1</sup> Database research indicates that 9500 W. Debbie Lane, Milwaukee, WI 53224 is owned by Clarence Greer, Sr. D.O.B 03/25/29. This address is also used by Greer as a business address for All City Limousine.

2019, in the name of Home Improvements by CL, LLC, with Corey Lee identified as the CEO of the business and only responsible member for the account. The July 1, 2019 beginning balance for the ECU checking account ending in # 1697 was \$142.19, and the savings account beginning balance for this account was \$5.36. The email address associated with the opening this account was clhomeimprovements@att.net.

38. On July 10, 2019, an additional \$7,000 cash deposit was made into the ECU account ending in #1697. During the month of July 2019, a total of approximately \$24,141 in debit/ATM withdrawals were conducted on this account. Included in these debits were airline charges and various debit transactions in Miami, Florida.

### **CONCLUSION**

39. Based on the forgoing, I submit that there exists probable cause to believe that: Rolando GREER purchased the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** with proceeds of the above described scheme in violation of 18 U.S.C. § 1343, 18 U.S.C. §1957 and 18 U.S.C. § 1956 (a)(1)(B)(i) and the vehicle is subject to civil forfeiture under 18 U.S.C. §§ 981(a)(1)(A) and (C), including cross-references in § 981(a)(1)(C) to 18 U.S.C. §§ 1956(c)(7) and 1961(1), and criminal forfeiture under 18 U.S.C. §§ 981(a)(1)(C) and 982(a)(1) and 28 U.S.C. § 2461(c).

40. I further submit that the **White Mercedes S550 Sedan bearing VIN WDDNG9EB0DA528708** is subject to seizure under both civil seizure, 18 U.S.C § 981(b), as well as the criminal seizure statutes, 18 U.S.C § 982(b)(1) and 21 U.S.C § 853(f).

41. Because a vehicle is mobile and can be easily transferred, hidden, damaged, or destroyed, I submit that a restraining order issued under 21 U.S.C. § 853(e) would be insufficient to assure the availability of this vehicle in its current condition for forfeiture.